To: Greenwalt, Sarah[greenwalt.sarah@epa.gov]; Minoli, Kevin[Minoli.Kevin@epa.gov]
Cc: Hupp, Sydney[hupp.sydney@epa.gov]; Keith, Jennie[Keith.Jennie@epa.gov]

From: Fugh, Justina

Sent: Tue 4/18/2017 7:47:20 PM

Subject: RE: Speaking request for Admin Pruitt [WARNING: SPF validation failed]

HOW TO REVIEW POLITICAL INVITATIONS.doc

Hi Sarah.

I hadn't seen this request yet, but it definitely presents significant Hatch Act issues. For example, as a federal employee, Mr. Pruitt cannot ever engage in any fundraising for any political party or group, which includes how the organization refers to him in its publicity material if indeed he agrees to do this event. In addition, there are restrictions with regard to whether they can include his EPA title and position in connection with partisan political activity, and the organization will have to pay for his travel expenses.

Historically, EPA administrators have not engaged in partisan events in non-Presidential election years. Because other employees should not be assisting with political events, we have tried to limit dramatically the number of employees who review and assess political invitations. In the past, only the Chief of Staff received such invitations, and s/he worked directly with OGC/ethics. We don't have to follow that exact same model, but I would like to limit the number of people involved so as to protect them from any concerns about any inadvertent Hatch Act violations. Previously, OGC/ethics developed the attached guidance to assist the immediate office in assessing political invitations.

If the Administrator wishes to consider this invitation, then we should identify the one person who will work on political invitations with me so that we can identify the necessary groundrules. Would that person be you?

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Greenwalt, Sarah

Sent: Monday, April 17, 2017 10:28 AM **To:** Minoli, Kevin Minoli, Kevin@epa.gov

Cc: Fugh, Justina <Fugh.Justina@epa.gov>; Hupp, Sydney <hupp.sydney@epa.gov> **Subject:** Fwd: Speaking request for Admin Pruitt [WARNING: SPF validation failed]

Kevin, this was the request I mentioned.

Justina, has this come across your desk yet? Would you please get with Syd to see if this is something AP could do?

Thank you!

Sent from my iPhone

Begin forwarded message:

From: "Hupp, Sydney" < hupp.sydney@epa.gov>

Date: April 17, 2017 at 9:24:49 AM EDT

To: "Jackson, Ryan" < jackson.ryan@epa.gov>

Cc: "Greenwalt, Sarah" < greenwalt.sarah@epa.gov>

Subject: RE: Speaking request for Admin Pruitt [WARNING: SPF validation failed]

I have Sarah checking out the ethics of this.

Sydney Hupp

Office of the Administrator- Scheduling

202.816.1659

From: Jackson, Ryan

Sent: Saturday, April 15, 2017 7:05 PM

From: Pollard, Pam [mailto:pam@okgop.com] Sent: Tuesday, April 11, 2017 11:52 AM To: Jackson, Ryan <jackson.ryan@epa.gov> Subject: Speaking request for Admin Pruitt [WARNING: SPF validation failed] Ryan, Congratulations on your new job as COS for Administrator Scott Pruitt! Our nation truly is in a better place with you two at the EPA. I would like to request Admin Pruitt to be our keynote speaker at our largest fundraiser of the year, The State Convention's Gala Dinner on May 5th, 2017 at the FirstMoore Baptist (301 NE 27th St, Moore, OK 73160). Reception begins at 6 p.m. where Admin. Pruitt would be the guest of honor with the dinner at 7 p.m. when he would give the keynote address around 7:45 p.m. The theme for the weekend is "Celebrate Oklahoma". The Republican Party is proud to have voted for the Republican nominee for President for the 4th consecutive election which led to Donald J. Trump becoming the 45th President of the United States. We celebrate our 94% win record on the ballot in 2016 where the state democrats did not win a single race on the ballot. But, the greatest celebration of all is our own Scott Pruitt and we would love to honor him for his achievements! We are not only celebrating political victories, but we will have a special program on Saturday highlighting the Governor's Oklahoma Fosters Program asking our delegates to become more involved in the foster care program.

Subject: FW: Speaking request for Admin Pruitt [WARNING: SPF validation failed]

To: Hupp, Sydney < hupp.sydney@epa.gov>

The audience will consist of approximately 500 OKGOP supporters and donors.
Press attendance will be subject to your office's preference.
I look forward to hearing from your office on Admin. Pruitt's availability.
Pam Pollard, Chairman
Oklahoma Republican Party
405.420.8154
pam@okgop.com